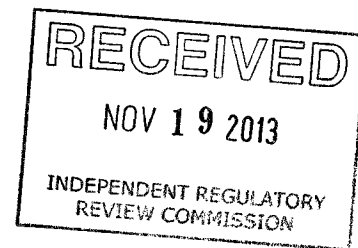


Cooper, Kathy

From: Jim Buckheit <jbuckheit@pasa-net.org>
Sent: Monday, November 18, 2013 3:55 PM
To: IRRC
Subject: Comments re: State Board of Education Regulation #6-326 IRRC#2976
Attachments: PASA IRRC Chapter 4 11-18-2013.pdf

Attached please find comments on the above reference regulation submitted on behalf of the Pennsylvania Association of School Administrators.

Jim Buckheit
Executive Director
PA Association of School Administrators
(717) 540-4448





Pennsylvania Association of School Administrators

2608 Market Place ~ Harrisburg, PA 17110-9358
(717) 540-4448 (717) 540-4405 fax www.pasa-net.org

November 18, 2013

Mr. Silvan B. Lutkewitte, III
Chair
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Re: IRRC# 2976 State Board of Education #6-326

Dear Chairman Lutkewitte:

The Pennsylvania Association of School Administrators (PASA), whose members include school district superintendents, intermediate unit executive directors and other chief school administrators, finds that its membership is widely divided over the State Board of Education's Chapter 4 regulations scheduled for consideration by the Independent Regulatory Review Commission later this week.

PASA has expressed its views on this submission and numerous earlier changes to the Chapter 4 regulations since 2005 through meetings with policymakers, in testimony before the State Board, legislative committees and IRRC, and in letters to the State Board of Education.

Although we believe the changes to Chapter 4 are a positive step forward, we continue to have the following concerns, based upon the principles and aspirations for public education that are outlined in the PASA Resolutions document and which reflects the position of the Association:

- The regulations continue to diminish local control of education policy.
- The regulations impose new unfunded state mandates (remediation and project-based assessment) that will drive local taxes up at the same time as state funding for classroom instruction and supports remains relatively flat.
- The proposed regulations are not research-based nor adequately funded to ensure that accountability in management and educational progress is both measurable and achievable.
- School leaders were not a partner in developing and implementing the standards and statewide assessments, procedures and timelines, so they will impose undue burdens and stress on both students and staff instead of promoting a positive classroom testing environment that provides students

with the best opportunity to demonstrate their understanding of curriculum content.

- The policies are not research-based, do not reflect the reality that students have individual needs, nor do they recognize that evaluation of student achievement should be based on the individual student's progress in mastering those standards, and not measured by success on a single test.
- The regulations, while an improvement over the current regulations, will continue to impose a new state assessment system that adversely impacts student learning time.
- PASA opposes the use of any standardized test as the sole criteria for school districts, school or staff evaluation, or as a standard for student graduation.
- Before new requirements on school districts are enacted, state policymakers must carefully research and consider the financial, staffing, educational and operational impact of the proposal within the broader view of existing requirements and the overall educational mission of public education.
- Mandated educational requirements established by state officials must be adequately funded at the state level to avoid placing an undue financial burden on local communities and must include sufficient flexibility to ensure that local school officials are able to comply with the new requirements without placing undue stress on the educational program or effective school district management.

The Chapter 4 regulations are issues that have been debated since 2005, when the State Board of Education proposed changes that would have established high stakes Graduation Competency Exams that, as under the new regulation, would have required students to pass the tests in order to graduate. Publication of the Chapter 4 regulations in 2010 established the Keystone Exams and Common Core State Standards. This regulation finally brought some certainty about the direction of state policy so that school districts could begin planning and undertaking curriculum redesign necessary to meet the new requirements.

In the midst of the state budget crisis in 2011 that caused the Department of Education to delay development and implementation of the Keystone Exams, school districts faced uncertainty about whether to place their own plans on hold or to continue their work towards implementation of the new requirements. In the summer of 2012, the Department of Education once again changed direction by announcing that it was discontinuing the 11th grade PSSA in the 2012-13 school year and that districts would be required to administer the Algebra, Literature and Biology Keystone Exams to all students enrolled in 11th grade who had not previously taken the Keystone Exam as an end-of-course test. Around the same time, the Department of Education was negotiating a waiver of the federal No Child

11/18/2013

Page 3

Left Behind Act with the U.S. Department of Education. An important component of the waiver request was the implementation of the new Keystone Exams and Common Core State Standards. By receiving the waiver, the Commonwealth is now committed to carrying out the provisions of the waiver request.

It is important to consider these events, as they reflect the instability, disruption and uncertainty over the future of state education policy going back to the first Chapter 4 proposal that was introduced in 2005. In addition to the instability imposed by the state, continued inaction by Congress to reauthorize the No Child Left Behind Act, due in 2007, imposes considerable cost on both school districts and the Commonwealth. This instability, disruption and uncertainty continue to impose considerable education and financial costs on students, schools and taxpayers.

The uncertainty and instability must end. It is disrupting educational opportunities for students, costing taxpayers millions of dollars in unnecessary spending, and negatively impacting the morale of educators, driving many to early retirement or leaving the profession.

For all of these reasons, although the policies contained in the final form regulation are far from reflecting the fundamental beliefs and wishes of PASA members, they do reflect movement in the right direction from those contained in the current Chapter 4 regulations. Considerable work will be needed in the future to address the challenges these policies will present to students, schools and the Commonwealth. PASA members stand ready to work with state policymakers to address these challenges.

Problems with the policy can be corrected. Uncertainty over the future can only be corrected by taking action to move on from these issues.

Sincerely,

G. Brian Toth
President

Sherri Smith
President-Elect

Eric C. Eshbach
Past-President

Richard W. Fry
Treasurer

Jim Buckheit
Executive Director